



100 Duffy Ave., Suite 510

Hicksville, NY 11801

Tel.: 929.324.0717

Fax: 929.333.7774

E-mail: mars@khaimovlaw.com

Mars Khaimov Law, PLLC**VIA ECF**

Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

January 17, 2025

Re: Case 1:23-cv-06879-JGLC Toro v. Dean & Tyler, Inc.
Request for Extension of Time to File Motion for Summary Judgment

Dear Judge Clarke:

Plaintiff respectfully submits this letter-motion to request a three-week extension of time to file its motion for summary judgment, which is currently due today, January 17, 2025. Plaintiff acknowledges and apologizes for this late request. This office reached out to defense counsel's office on January 15, 2025, and January 16, 2025 to obtain consent to this request, but, to date, no response has been received. As such, Plaintiff is submitting this request on the date of the current deadline. This office is requesting more time to confer with Plaintiff, get more information from her, and conduct research in order to file the motion. An extension up to and until February 7, 2025 is being sought. This is the first such request.

Plaintiff thanks the Court for its attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov
Mars Khaimov, Esq.
Attorney for Plaintiff

Cc: all counsel of record on ECF

Application DENIED. The Court's prior order (ECF No. 29) made clear that no further extensions of the summary judgment and *Daubert* motion schedule would be granted absent extraordinary circumstances. Plaintiff now seeks an extension of this deadline, after the date the motion was due in violation of the Court's Individual Rules, and without any explanation, much less a showing of extraordinary circumstances, that would justify the extension. The Clerk of Court is respectfully directed to terminate ECF No. 30.

Dated: January 21, 2025
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

